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26 *Attorneys for Plaintiffs; additional counsel  
27 listed in signature blocks below*

28 **UNITED STATES DISTRICT COURT**

1 **NORTHERN DISTRICT OF CALIFORNIA**

20 ANIBAL RODRIGUEZ, et al., individually  
21 and on behalf of all other similarly situated,

22 Plaintiffs,

23 vs.

24 GOOGLE LLC

25 Defendants.

26 Case No. 3:20-cv-4688-RS

27 **STIPULATION EXTENDING TIME TO  
28 RESPOND TO SECOND AMENDED  
COMPLAINT AND [PROPOSED] ORDER**

1 Judge: Hon. Richard Seeborg  
2 Court: Courtroom 3 – 17<sup>th</sup> Floor

1 Pursuant to Civil Local Rules 6-2 and 7-12, Plaintiffs Anibal Rodriguez, et al. (“Plaintiffs”)  
 2 and Defendant Google LLC (“Google”), hereby stipulate to the extension of the deadline for Google  
 3 to file its Answer to Plaintiffs’ Second Amended Complaint by twenty-one (21) days, from  
 4 September 1, 2021 up to and including September 22, 2021.

5 Google and Plaintiffs (collectively, the “Parties”), by and through their respective counsel,  
 6 hereby stipulate and agree to the following:

7 WHEREAS, on June 11, 2021 Plaintiffs filed their Second Amended Complaint for (1)  
 8 Breach of Contract; (2) Invasion of Privacy Act Violations, Cal. Penal Code § 631; (3) Violations  
 9 of the Comprehensive Computer Data Access and Fraud Act (“CDAFA”), Cal. Penal Code § 502 *et*  
 10 *seq.* (4) Invasion of Privacy; (5) Intrusion Upon Seclusion;

11 WHEREAS, on June 25, 2021 Google filed a Motion to Dismiss Second Amended  
 12 Complaint Pursuant to Fed. R. Civ. P. 12(b)(6), and in the Alternative, Motion to Strike Pursuant to  
 13 Fed. R. Civ. P. 12(f);

14 WHEREAS, on August 18, 2021 Hon. Richard Seeborg issued an Order Granting in Part  
 15 and Denying in Part [Google’s] Motion to Dismiss and ordered that any amended complaint must  
 16 be filed within 14 days of issuance of that Order;

17 WHEREAS, pursuant to Fed. R. Civ. P. 12(a)(4)(A), Google’s deadline to file an Answer to  
 18 Plaintiffs’ amended complaint lands on the same day as Plaintiffs’ deadline to amend their Second  
 19 Amended Complaint.

20 NOW THEREFORE, IT IS HEREBY STIPULATED AND AGREED, by and between the  
 21 parties to this action, and pursuant to Civil Local Rules 6-2 and 7-12, that Google’s deadline for  
 22 filing an Answer to Plaintiffs’ Second Amended Complaint is September 22, 2021.

23  
 24 DATED: August 31, 2021

25 By: /s/ Mark C. Mao

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*Attorneys for Plaintiffs*

DATED: August 31, 2021

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*Attorneys for Defendant Google LLC*

1 **FILER'S ATTESTATION**

2 Pursuant to Civil Local Rule 5.1, I attest that all signatories listed, and on whose behalf this  
3 filing is submitted, concur in the filing's content and have authorized this filing.

4 DATED: August 31, 2021

5 WILLKIE, FARR & GALLAGHER LLP

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7 /s/ Benedict Y. Hur

8 Benedict Y. Hur

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UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

ANIBAL RODRIGUEZ, et al., individually and  
on behalf of all other similarly situated,

Case No. 3:20-cv-4688-RS

## [PROPOSED] ORDER

Plaintiffs,

VS.

GOOGLE LLC

## Defendants

Pursuant to stipulation of the Parties, the Court hereby **ORDERS** that Google's deadline for filing an Answer to Plaintiffs' Second Amended Complaint is September 22, 2021.

## IT IS SO ORDERED.

Dated:

## The Honorable Richard Seeborg